

FEDERAL TRADE COMMISSION,	)	
Plaintiff,	)	Case No: 17-cv-02000-APG-GWF
	)	
v.	)	
	)	
REVMOUNTAIN, LLC, a Nevada limited	)	
liability company, et al.,	)	
	)	<b>STIPULATED ORDER TO</b>
	)	<b>RELEASE FUNDS FOR DEFENDANT</b>
Defendants.	)	<b>JENNIFER JOHNSON'S LIVING AND</b>
	)	<b>DESIGNATED CREDITOR EXPENSES</b>

IT IS FURTHER ORDERED that Defendant Johnson shall make all reasonable efforts to sell her residence to a bona fide third-party purchaser for fair market value, including reasonable and ordinary realtor's fees and closing costs, as soon as practicable. Defendant Johnson shall

1 notify the FTC of the identity of the proposed purchaser no later than 5 business days before the  
2 sale closes, and shall provide the FTC with the Closing Disclosure no later than 2 business days  
3 before the sale closes. Defendant Johnson shall use the proceeds of such sale to pay off the  
4 mortgage and home equity line of credit on the residence. Defendant Johnson shall provide  
5 closing documents to the FTC. Defendant Johnson shall deposit any proceeds from the sale that  
6 remain after payment of liens and reasonable costs, and any released funds not expended for  
7 mortgage payments if the home was sold in less than four months, into a separate, newly opened  
8 and specifically designated frozen account that shall not include monies from any other sources.  
9 Neither Defendant Johnson nor the FTC waives or concedes any legal or equitable rights,  
10 remedies, or defenses they may possess with respect to the property, its proceeds, or any other  
11 property, including any rights to statutory characterization of the sale proceeds for exemption  
12 purposes. Defendant Johnson and the FTC have stipulated that all applicable statutory  
13 exemption periods with respect to the proceeds shall be tolled until the conclusion of this  
14 litigation as to Defendant Johnson.

15 IT IS FURTHER ORDERED that Defendant Johnson shall make all reasonable efforts to  
16 sell her 2015 Mercedes SUV to a bona fide third-party purchaser for fair market value as soon as  
17 practicable. Defendant Johnson shall notify the FTC of the identity of the proposed purchaser  
18 and terms of the proposed sale no later than 5 business days before the sale closes, and shall  
19 provide the FTC with the sale documents as soon as practicable after the sale closes. Defendant  
20 Johnson shall use the proceeds of such sale to pay off the lien on the car held by Elevations  
21 Credit Union, and any reasonable costs of the sale. Defendant Johnson shall provide  
22 documentation of the sale and lien payoff to the FTC. Defendant Johnson shall deposit any  
23 proceeds from the sale that remain after payment of the lien and reasonable costs into the frozen  
24 account ending in -8880 held at Wells Fargo Bank.

25 IT IS FURTHER ORDERED that Defendant Johnson may sell or otherwise dispose of  
26 personal property consisting of baby clothing, equipment, and accessories, which Defendant  
27 Johnson represents is worth approximately \$400 to \$500, and may retain proceeds from such sale  
28

up to \$500. Should the items sold net more than \$500, Defendant Johnson shall place the amounts exceeding that cap into the frozen account ending in -8880 held at Wells Fargo Bank.

SO STIPULATED:

**FOR THE PLAINTIFF FEDERAL TRADE COMMISSION:**

/s/ Sarah Waldrop

SARAH WALDROP

MICHELLE SCHAEFER

600 Pennsylvania Avenue, NW CC-9528

Washington, DC 20580

Tel. 202-326-3444, -3515

swaldrop@ftc.gov, mschaefer@ftc.gov

**FOR DEFENDANT JENNIFER JOHNSON:**

/s/ Richard Newman

RICHARD NEWMAN

Hinch Newman LLP

40 Wall Street, 35th Floor

New York, NY 10005

212-756-8777

rnewman@hinchnewman.com

**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: 9/15/2017